



## UNITED STATES DISTRICT COURT

for the  
District of New Mexico

United States of America  
v.

Noah Caleb MARTIN

Case No. 23-MJ-1484

Defendant(s)

## CRIMINAL COMPLAINT

I, the complainant in this case, state that the following is true to the best of my knowledge and belief.

On or about the date(s) of September 21, 2023 in the county of Bernalillo in the  
District of New Mexico, the defendant(s) violated:

*Code Section*

18 U.S.C §§ 922(g)(1) and 924:

*Offense Description*

Felon in possession of a firearm and ammunition

This criminal complaint is based on these facts:

See attached affidavit

☐ Continued on the attached sheet.

*Complainant's signature*

Emmett Fritz, Special Agent

*Printed name and title*

Telephonically sworn and electronically signed.

Date: 10/4/2023

City and state: Albuquerque, New Mexico

*Judge's signature*

Honorable Steven C. Yarbrough, U.S. Magistrate Ju

*Printed name and title*

**AFFIDAVIT IN SUPPORT OF CRIMINAL COMPLAINT**

**INTRODUCTION AND AGENT BACKGROUND**

I am a Special Agent with the DEA, and have been since January 2019. As such, I am a “federal law enforcement officer” within the meaning of Federal Rule of Criminal Procedure 41(a)(2)(C), that is, a government agent engaged in enforcing the criminal laws and duly authorized by the Attorney General to request arrest and search warrants. Furthermore, I am a law enforcement officer of the United States within the meaning of 18 U.S.C. § 2510(7), and I am empowered by law to conduct investigations and to make arrests for criminal offenses, to include those enumerated in 18 U.S.C. § 2516.

Prior to becoming a Special Agent, I was a police officer with the Albuquerque Police Department (“APD”) for approximately 3 years, where I served in the Field Services Bureau division. I graduated from the DEA Training Academy in Quantico, Virginia, after receiving approximately 16 weeks of specialized narcotics-related training. While at the DEA Training Academy, I became familiar with how controlled substances are consumed, manufactured, packaged, marketed, and distributed. I received training on surveillance and counter-surveillance operations, undercover operations, confidential source operations, criminal law, and investigations involving federal electronic surveillance statutes, to include Title III wiretaps, drug identification, search warrant executions, and vehicle stops.

My experience as a Special Agent includes, but is not limited to, conducting surveillance, interviewing witnesses, writing affidavits for and executing search and seizure warrants, debriefing defendants and confidential sources and working with undercover agents and informants. I have received training and have experience in the investigation of violations of the federal drug and money laundering laws, including the offenses listed below. As a result, I am

familiar with matters including, but not limited to, the means and methods used by drug traffickers and drug trafficking organizations to purchase, transport, store, and distribute illegal drugs and to hide profits generated from those transactions. I also have experience in analyzing and interpreting drug codes and cryptic dialogues used by drug traffickers. I also know that drug traffickers utilize various firearms as tools of the drug trade to assist in their distribution of illegal drugs. I have experience investigating the possession and use of firearms as tools of the drug trade. I have also spoken with other law enforcement officers with expertise and experience in these areas.

This case is being investigated by the DEA. I have personally participated in the investigation described below. I make this affidavit based on my participation in the investigation, reports and information made available to me by other agents and Task Force Officers, as well as other law enforcement authorities. This affidavit is intended to show that there is sufficient probable cause for the requested warrant and does not set forth all of my knowledge or surrounding facts pertaining to this matter.

#### **PROBABLE CAUSE**

The facts set forth in this affidavit are known to me as a result of my investigation and interviews with other agents and law enforcement officers. This affidavit presents a synopsis of events, not a complete description of everything that occurred or a verbatim transcript of statements made. These are not all the facts known to me throughout the course of this investigation, but rather only those that are essential to establish probable cause for a criminal complaint charging Noah Caleb MARTIN with the following violation:

- **18 U.S.C §§ 922(g) and 924:** felon in possession of a firearm and ammunition

On September 21<sup>st</sup>, 2023, the Albuquerque Police Department Investigative Support Unit (ISU) was conducting a surveillance operation on a subject identified as Jose Romero. Romero had a current warrant for his arrest for a homicide. Detectives with ISU observed Romero drive his vehicle to the address of 4309 Avenida La Resolana Northeast, Albuquerque, New Mexico. Once the vehicle arrived, Detectives observed a male, later identified as Noah MARTIN, get into the passenger seat of Romero's vehicle. The ISU Detectives continued to surveil Romero and MARTIN.

During the surveillance operation, Detectives observed Romero and MARTIN make several stops in different locations around Albuquerque, where they briefly met with unknown individuals. Based on the Detectives' training and experience, they believed Romero and MARTIN conducted illegal hand-to-hand narcotics transactions. Later, during the surveillance operation, Detectives observed Romero and MARTIN stop at an Allsup's, located at 1605 Indian School Road NW, Albuquerque, NM. Detectives observed Romero and MARTIN exit the vehicle and proceed inside of the store. Detectives with ISU approached and detained Romero and MARTIN. MARTIN was detained outside of the vehicle.

Once MARTIN was detained by Detectives, he informed Detectives that he had a firearm concealed in his front waistband. Detectives removed the firearm from MARTIN and observed it to be a Glock 43 style handgun. This firearm was loaded and found to have one round of ammunition in the chamber. At this time, Detectives ran MARTIN's information with the National Crime and Information Center (NCIC) and discovered that MARTIN was a convicted felon out of the state of Arizona.

On September 22<sup>nd</sup>, 2023, I was informed about the arrest of Romero and MARTIN. At this time, I conducted a search into NCIC about MARTIN's criminal history. I was able to locate

an arrest for money laundering out of the state of Arizona. I then looked into Arizona court records and discovered that MARTIN was convicted following a guilty plea to a felony for Facilitation to Commit Money Laundering (Reference Case# S0300CR202100733) on March 28, 2022. I confirmed through Court records that the offense of conviction was a felony, that is, it was an offense punishable by more than one year imprisonment. I also reviewed the Minute Entry related to MARTIN's sentencing for that conviction, which reflects he was personally present and advised of the conviction and sentence on March 28, 2022.

On October 3<sup>rd</sup>, 2023, I removed the evidence related to MARTIN's arrest from APD evidence. On this date, the firearm, which is a Glock 43 bearing serial number AFHGD025, was test fired by DEA Speical Agent Ivar Hella. The firearm functioned as designed and passed all tests conducted. Special Agent Erica Rosenblum determined that the firearm was not manufactured in New Mexico, therefore it travelled in or affected interstate commerce.

All of the above-described events took place in Bernalillo County, in the District of New Mexico.

This affidavit has been reviewed and approved by AUSA Timothy Trembley.

I declare under the penalty of perjury that the foregoing is true and correct to the best of my knowledge.

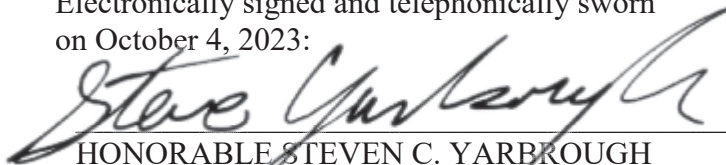
Respectfully submitted,



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Emmett Fritz  
Special Agent  
U.S. Drug Enforcement Administration

Electronically signed and telephonically sworn  
on October 4, 2023:



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HONORABLE STEVEN C. YARBROUGH  
UNITED STATES MAGISTRATE JUDGE